

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE:) CHAPTER 13
)
Theresa Allen Render,) CASE NO. 14-59818-PWB
)
DEBTOR.)

POST-CONFIRMATION MODIFICATION OF PLAN
AND REQUEST FOR ITS APPROVAL

Theresa Allen Render, Debtor, proposes to modify the Chapter 13 plan that was confirmed July 23, 2014 (Doc. No. 23).

MODIFICATION OF PLAN

Theresa Allen Render, Debtor, hereby modifies the confirmed plan by increasing Plan payments to cure a terms issue and adjust treatment of a creditor as demonstrated below:

1.

Plan Payments and Length of Plan. Debtor will pay the sum of **\$675.00** ~~\$410.00~~ ~~\$390.00~~ **Monthly at a rate of \$338.00** ~~\$205.00~~ ~~\$195.00~~ **semi-monthly** to Trustee by ☒ Payroll Deduction(s) or by ☐ Direct Payment(s) for the applicable commitment period of **36** months, unless all allowed claims in every class, other than long-term claims, are paid in full in a shorter period of time. The term of this Plan shall not exceed sixty (60) months. *See* 11 U.S.C. §§ 1325(b)(1)(B) and 1325(b)(4). Each pre-confirmation plan payment shall be reduced by any pre-confirmation adequate protection payment(s) made pursuant to Plan paragraph 6(A)(i) and § 1326(a)(1)(C).

2.

(a) Creditor	(b) Property description	(c) Estimated pre-petition arrearage	(d) Projected monthly arrearage payment
State Home Mortgage	7296 Toccoa Circle Union City, GA 30291	22,640.90 10,000.00	25.00 per month until June 2016 when payments step up to \$296.00 \$594.00 per month
Fulton County Tax Commissioner	7296 Toccoa Circle Union City, GA 30291	2000.00	15.00 per month until June 2016 when payments increase to \$40.00 per month
Oakley Township	7296 Toccoa Circle Union City, GA 30291	\$2,591.00 1153.00	15.00 per month until June 2016 when payments increase to \$40.00 \$30.00 per month

Dated: December 12, 2014

Respectfully submitted,
Khoshnood Law Firm, PC

Khoshnood Law Firm, PC
501 Pulliam Street, SW
Suite 130
Atlanta, GA 30312
(678) 507-1590
(404) 941-1420 Fax
klfnotices@yahoo.com

_____/s/_____
Jessica L. Casto
GA Bar No. 340570
Attorney for the Debtor

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE:)	CHAPTER 13
)	
Theresa Allen Render,)	CASE NO. 14-59818-PWB
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UNSWORN DECLARATION UNDER PENALTY OF PERJURY

I, Theresa Allen Render, hereby certify that the attached pleading is true and correct to the best of my information and belief.

Signed: ____/s/_____
Theresa Allen Render

Dated: December 12, 2014

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE:) CHAPTER 13
)
Theresa Allen Render,) CASE NO. 14-59818-PWB
)
DEBTOR.)

**NOTICE OF FILING OF MODIFICATION OF CONFIRMED PLAN,
DEADLINE FOR FILING WRITTEN OBJECTIONS, AND
HEARING DATE AND TIME IF OBJECTION IS TIMELY FILED**

To: Creditors and Other Parties in Interest

PLEASE TAKE NOTICE that Theresa Allen Render filed a proposed Modification to the confirmed Plan in this case, a copy of which Modification you are receiving with the notice or have recently received by mail. Pursuant to Rule 3015(g) of the Federal Rules of Bankruptcy Procedure, any creditor or other party in interest opposing this proposed Modification must file that objection in writing with the Court on or before the following deadline.

DEADLINE FOR FILING OBJECTION: Twenty-four (24) days after the date on which the proposed Modification was filed. The proposed Modification was filed on December 12, 2014. If the twenty-fourth day after the date of service falls on a weekend or holiday, the deadline is extended to the next business day.

PLACE OF FILING:	Clerk, U.S. Bankruptcy Court Suite 1340, U.S. Courthouse 75 Spring Street, SW Atlanta, GA 30303
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If you mail an objection to the Court for filing, you must mail it early enough so the Court will receive it on or before the date stated above. You must also serve a copy on the undersigned at the address stated below and on the Debtor at 7296 Toccoa Circle, Union City, GA, 30291.

PLEASE TAKE FURTHER NOTICE that, if an objection to the proposed Modification is timely filed, the Court will hold a hearing on the Modification in **Courtroom 1401**, U.S. Courthouse, 75 Spring Street, Atlanta, GA **on January 28, 2015 at 9:50 A.M.**

If no objection is timely filed, the proposed Modification will be effective pursuant to 11 U.S.C. §1329(b)(2) as part of the confirmed Plan without further order or notice.

Dated: December 12, 2014

Respectfully submitted,
Khoshnood Law Firm, PC

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Atlanta, GA 30312
(678) 507-1590
(404) 941-1420 Fax
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_____/s/_____
Jessica L. Casto
GA Bar No. 340570
Attorney for the Debtor

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE:) CHAPTER 13
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CERTIFICATE OF SERVICE

I, the undersigned, certify under penalty of perjury that I have served the following parties with a copy of the "Post Confirmation Plan Modification and Notice of Hearing" by placing true copies of same in the United States Mail with adequate postage affixed to ensure delivery and/or electronically through the CM/ECF Noticing System.

Mary Ida Townson (via ECF)
Chapter 13 Trustee
191 Peachtree Street, NE
Suite 2200
Atlanta, GA 30303-1740

Theresa Allen Render
7296 Toccoa Circle
Union City, GA 30291

Kimberly D. Rayborn
Attorney for State Home Mortgage
McCalla, Raymer, LLC
1544 Old Alabama Road
Roswell, GA 30076

State Home Mortgage
Bankruptcy Department
60 Executive Park South
Atlanta, GA 30329

(Plus creditors in the attached Mailing Matrix)

Dated: December 12, 2014

Respectfully submitted,
Khoshnood Law Firm, PC

Khoshnood Law Firm, PC
501 Pulliam St., SW
Suite 130
Atlanta, GA 30312
klfnofices@yahoo.com
(678) 507-1590
(404) 941-1420 Fax

/s/_____
Jessica L. Casto
GA Bar No. 340570
Attorney for the Debtor

Label Matrix for local noticing
113E-1
Case 14-59818-pwb
Northern District of Georgia
Atlanta
Fri Dec 12 14:25:05 EST 2014

(p)BANK OF AMERICA
PO BOX 982238
EL PASO TX 79998-2238

Credit First/CFNA
Bk13 Credit Operations
Po Box 818011
Cleveland, OH 44181-8011

Dr. Lisa Perry-Gilkes M.D.
3885 Princeton Lakes Way
Atlanta, GA 30331-5589

Fulton County Tax Commissioner
141 PRYOR ST SUITE 1113
Atlanta, GA 30303-3444

(p)GEORGIA DEPARTMENT OF REVENUE
COMPLIANCE DIVISION
ARCS BANKRUPTCY
1800 CENTURY BLVD NE SUITE 9100
ATLANTA GA 30345-3202

Georgia Housing and Finance Authority
c/o State Home Mortgage
Bankruptcy Department
60 Executive Park South
Atlanta, GA 30329-2296

HSBC Auto Finance / Santander
Santander Consumer USA
Po Box 961245
Fort Worth, TX 76161-0244

IRS
Central Insolvency Operation
PO Box 7346
Philadelphia, PA 19101-7346

JP Morgan Chase Bank
Attn: Bankruptcy
Po Box 15298
Wilmington, DE 19850-5298

Lazega & Johanson, LLC
3520 Piedmont Road, NE
Suite 415
Atlanta, GA 30305-1512

Oakley Township
c/o G. Lanier Coulter, JR
160 Clairemont Ave, ste 650
Decatur, GA 30030-2534

Oakley Township Homeowners Association, Inc.
c/o Kathy K. Dorough
Dorough & Dorough, LLC
160 Clairemont Avenue, Suite 650
Decatur, Georgia 30030-2534

Pinnacle Credit Union
536 North Ave NE
Atlanta, GA 30308-2713

Polaris Medical Group ENT LLC
3885 Princeton Lakes Way
Ste 312A
Atlanta GA 30331-7100

Revenue Recovery Corp
612 Gay St
Knoxville, TN 37902-1603

State Home Mortgage
60 Executive Park South
Atlanta, GA 30329-2296

U. S. Attorney
600 Richard B. Russell Bldg.
75 Spring Street, SW
Atlanta GA 30303-3315

United States Department of Education
Claims Filing Unit
P O Box 8973
Madison, WI 53708-8973

Us Dept Of Ed/glelsi
2401 International
Madison, WI 53704-3121

Usdoe/glelsi
2401 International
Madison, WI 53704-3121

Hooman Khoshnood
Khoshnood Law Firm
Suite 130
501 Pulliam Street, SW
Atlanta, GA 30312-2770

Mary Ida Townson
Chapter 13 Trustee
Suite 2200
191 Peachtree Street, NE
Atlanta, GA 30303-1770

Theresa Allen Render
7296 Toccoa Circle
Union City, GA 30291-3433

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Bank Of America
Po Box 982235
El Paso, TX 79998

Georgia Department of Revenue
1800 Century Blvd, NE
Suite 17200
Atlanta, GA 30345-3206

(d)Georgia Department of Revenue
Accounts Receivable Collections Section
1800 Century Boulevard N.E., Suite 9100
Atlanta, Georgia 30345-3205

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Oakley Township Homeowners Association, In

(u)State Home Mortgage

End of Label Matrix	
Mailable recipients	23
Bypassed recipients	2
Total	25